NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 6

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January 19, 2018

Mr. Lawrence J. McShea Project Manager Arconic Inc. Arconic Technical Center 100 Technical Drive New Kensington, PA 15069-0001

RE: Site No. 645001, Alcoa Secure Landfill, Massena (T), St. Lawrence County

Dear Mr. McShea:

The Department and the New York State Department of Health (NYSDOH) have reviewed the Certification Report for Expansion of Cell 3 of the Secure Landfill, dated November 30, 2017, and the Secure Landfill Cell 3 – 2017 Operations Report, dated November 27, 2017. Based on that review, we have the following comments:

Certification Report for SLF Cell 3 Expansion

- Section 2.1 General (p. 2-1) The 4th bullet states, "Continuous air monitoring during work hours." This is incorrect, as continuous CAMP air monitoring was required 24 hours a day, seven days a week while the landfill was open until it was closed for the season in November 2017. Please revise the 4th bullet statement accordingly.
- 2. <u>Section 2.1.1 Mobilization (p. 2-2)</u> During site visits, the Departments observed that a water misting tanker truck was available on-site. Please include this and verify that this is a comprehensive and accurate list of the equipment on site.
- 3. <u>Section 2.1.4 Air Monitoring Programs (p. 2-3)</u> Please update to include the portable monitoring CAMP stations in the numbered list.
- Appendix B Included in Appendix B, are the Daily Quality Assurance Summary Reports from April 11, 2017 to October 13, 2017. However, documentation in the report indicates that SLF expansion construction related field activities ended on November 17, 2017. Please include the daily CQA summary reports for the missing time period, from October 14, 2017 through November 17, 2017.

SLF Cell 3 - 2017 Operations Summary Report

- 1. <u>Introduction (p. 2)</u> Please correct the first sentence on this page from "Cell 4 operations" to "Cell 3 operations."
- 2. <u>2017 Cell 3 Operations Activities (p. 2)</u> Please update the "Perimeter Air Monitoring" bullet to include the two portable air monitors set up in August 2017.
- 3. <u>2017 Cell 3 Operations Activities (p. 2)</u> Under the "Perimeter Air Monitoring" bullet, please include a description of CAMP exceedances.
- 4. 2017 Cell 3 Operations Activities (p. 2) Please note that worker air monitoring does not appear to be included in "Attachment A" as stated in the 4th bullet of this section.

Please revise both reports and submit them for the Departments' review. In the meantime, if you have any questions or would like to discuss these comments, please feel free to contact me at (315) 785-2522.

Sincerely,
Pontal K. Hand

Rachel K. Gardner, E.I.T.

Engineer Trainee

cc: Adolph Everett (USEPA)

Scarlett McLaughlin (NYSDOH) Maureen Schuck (NYSDOH) Peter Taylor (NYSDEC)